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December 15, 2023

CLERK OF COURT  
United States District Court  
District of South Carolina  
Charleston Division  
P.O. Box 835  
Charleston, SC 29402

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CLERK, CHARLESTON, SC  
2023 DEC 19 PM 12:28

**RE: Jay Connor v. John Does 1 – 10**  
**Case No. 2:23-cv-1452-JD-MGB**  
**Letter Motion for Issuance of Subpoena and Case Status**

Dear Clerk:

Pursuant to Federal Rules of Civil Procedure 45(a)(3), and with permission from the court, I am requesting the clerk issue the attached subpoena to Jason Lavoie. The subpoena (Exhibit A) seeks a deposition with Mr. Lavoie to clarify and supplement his response to the previous court-approved subpoena issued to him for documents.

In his response to the previous subpoena, Mr. Lavoie acknowledged an important role regarding assertions made in the Amended Complaint. He responded that he was involved with the return address at 1500 Weston Road #200-16, Weston, FL 33326, and described the location as a return “hub” for packages, which would have included the covid testing kit shipment. (Exhibit B) However, he indicated that a different company from Illinois shipped the kits, not the company in his return address, and Mr. Lavoie has not provided further information about this company.<sup>1</sup>

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<sup>1</sup> Plaintiff attempted unsuccessfully to resolve this issue with Mr. Lavoie prior to filing a request for a deposition subpoena.

Mr. Lavoie has knowledge of, is in possession of, or has access to relevant information regarding the names of the company(s) authorized to use his address, 1500 Weston Road, Weston Florida, as a return shipping hub, and use his address as a return address for shipping labels. Those anonymous companies received information and direction from the telemarketing companies. More importantly, through a short deposition specific to questions surrounding this case, he can provide testimony, information via correspondence and agreements that may reveal the names of John Does responsible for the calls alleged in the Amended Complaint. Thank you in advance for your consideration.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Jay C. Connor', written over a horizontal line.

Jay C. Connor  
(843) 557-5724